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July 10, 2020

By ECF

Hon. Michael A. Hammer, U.S.M.J.
 United States District Court
 for the District of New Jersey
 50 Walnut Street
 Newark, NJ 07102

RE: *Industria de Alimentos Zenú S.A.S. v. Latinfood U.S. Corp. d/b/a Zenú Prods. Co., et al.,*
Civ. Action No. 2:16-cv-6576-KM-MAH

Dear Judge Hammer:

We represent Plaintiff/Counter Defendant Industria de Alimentos Zenú S.A.S. (“Industria”) and third party Defendant Cordialsa USA, Inc. (“Cordialsa”), and write jointly with Defendants Latinfood U.S. Corp. (“Latinfood”) and Wilson Zuluaga (“Zuluaga” and with Latinfood, “Defendants”) pursuant to the Court’s June 29 Order, to set forth the parties’ proposed schedule.

Deadline for production of documents from the hard drive, with a log of withheld files	September 4, 2020
Deadline for discovery disputes to be raised	September 18, 2020
Deadline for fact witness depositions	October 16, 2020
Deadline for expert reports	The parties agree that there will be no merits experts, and that the parties must disclose the identity of any damages expert, except for rebuttal expert, by October 23, 2020. Any damages expert report will not be due until after an adjudication on the merits of the parties’ claims.
Deadline for Industria’s moving brief on its spoliation and/or sanctions motion	November 9, 2020
Deadline for Defendants’ opposition brief on its spoliation and/or sanctions motion	November 30, 2020
Deadline for Industria’s reply brief on its spoliation and/or sanctions motion	December 10, 2020
Deadline for moving briefs on summary judgment	30 days after a decision is issued on the spoliation and/or sanctions motion
Deadline for opposition briefs on summary judgment	30 days after the moving brief deadline
Deadline for reply briefs on summary judgment	21 days after the opposition brief deadline

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We thank the Court for its attention to this matter.

Respectfully,

/s/ Samuel Kadosh

SK:jv

cc: Mark J. Ingber, Esq.

SO ORDERED

/s Michael A. Hammer

United States Magistrate Judge

July 13, 2020